

MOSER TABOADA

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VIA ECF

Hon. James B. Clark, U.S.M.J.
United States District Court for the District of New Jersey
Martin Luther King Building & U.S. Courthouse
50 Walnut Street
Newark, NJ 07101

Re.: **Ansell Healthcare Products LLC v. Glycobiosciences Inc.,**
Case No. 16-cv-09254-SDW-JBC

Dear Judge Clark,

We represent Plaintiff Ansell Healthcare Products LLC in the above-referenced proceeding, and write this letter in response to the Letter from Kevin Drizen (with Exhibits A-F) sent to this Court on March 14, 2018, and made a part of the case docket on March 15, 2018 (Doc. No. 57).

When I attempted on March 15, 2018 to obtain Doc. No. 57 from ECF/PACER, I discovered that the document had been placed on the docket by the Clerk's Office under temporary seal, apparently at the request of Mr. Drizen. Unfortunately, Mr. Drizen did not see fit to serve Plaintiff with a copy of his filing, despite his obligation to do so.

After securing the consent of Defendant's counsel to directly contact his client, I informed Mr. Drizen by email that the sealing of documents is to prevent disclosure of certain sensitive materials to the general public, not other parties to the proceeding; and further, that *ex parte* communications with the Court are generally impermissible. I then asked Mr. Drizen to serve Doc. No. 57 upon Plaintiff without additional delay.

Despite my good faith efforts to resolve this matter with Mr. Drizen, he has so far refused to deliver a copy of the above-referenced documents to Plaintiff. Given the above, we respectfully request that this Court compel Mr. Drizen to serve these materials without further delay.

Thank you for your attention to this matter.

Respectfully submitted,

/s/Charles P. Guarino
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